

REMARKS/ARGUMENTS

Prior to the entry of this Amendment, claims 1, 3-5, 7-18, 20-24, 26-31, and 33-39 were pending in this application. No claim have been amended, no claims have been added, and no claims have been canceled herein. Therefore claims 1, 3-5, 7-18, 20-24, 26-31, and 33-39 remain pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Schneider in view of Dobbins, further in view of Liu

The final Office Action has rejected claims 1, 3-5, 7-18, 20-24, 26-31 and 33-42 under 35 U.S.C. § 103(a) as being unpatentable over U. S. Patent No. 6,408,336 of Schneider et al. (hereinafter "Schneider") in view of U. S. Patent Publication No. 2002/0066033 of Dobbins et al. (hereinafter "Dobbins"), and further in view of U.S. Patent No. 6,839,680 to Liu et al. (hereinafter "Liu"). The Applicants respectfully traverse the rejection and submit that the final Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, the references do not teach or suggest each claimed limitation. For example, none of the references, alone or in combination, teach or suggest accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from a group. The references also do not teach or

suggest, alone or in combination, updating an attribute of an identity profile for the group based on such a policy.

As discussed previously, Schneider is directed to "control of access to data in a distributed environment" (col. 1, lines 32-33) and more specifically to making access filters more scalable by decentralizing administration of these filters (col. 5, line 66 - col. 6, line 1). More specifically, Schneider discloses three types of policies, an access policy, an administrative policy, and a policy maker policy. Under Schneider, an access policy defines a user's or group's rights to access particular information while the administrative policy defines a user's ability to or rights to modify membership, i.e., defines who has administrative rights to add or remove members. However, as noted previously and as noted in the final Office Action, Schneider does not teach or suggest a plurality of policies for self-subscribing to and self-unsubscribing from a group. Rather, Schneider teaches an administrative policy that defines which user are allowed to add or remove members from a group. The process of adding or removing user to a group under Schneider is then carried out by these designated administrators in a manner similar to that described in the background section of the pending application. In other words, Schneider's administrative policy defines who can act as an administrator, i.e., who can change group membership, but "the administrators who have control over a user group are responsible for correctly defining membership in the user group." (Col. 16, lines 8-11, see also Background of the pending application, page 2, lines 20-28) Further and also as noted in the final Office Action, Schneider does not teach or suggest updating an attribute of an identity profile for the group, i.e., based on application of the policy.

In an attempt to demonstrate a teaching of policies for self-subscribing to or self-unsubscribing from a group, the final Office Action introduces Dobbins. Dobbins is directed to "a content management system . . . that links network providers, content providers, and subscribers for developing, distributing, managing, and paying for content resources." (paragraph 15) As such, Dobbins aims to "transfer or make available as much of the

administration functionality as possible to either the content provider or the subscriber." (paragraph 15) Under Dobbins, "the subscriber interacts with the Web-based DPG by clicking on hyperlinks." (paragraph 38) "Examples of requests bound to links are: subscribe or unsubscribe the subscriber to service bundles; schedule services to be started or stopped at some future time; request details about a service offer." (paragraph 38) Dobbins also describes allowing the subscriber to modify personal information, portal preferences, subscription information, etc. (paragraphs 39-43) However, Dobbins does not teach or suggest, alone or in combination with Schneider, a plurality of policies for self-subscribing to and self-unsubscribing from a group. Rather, Dobbins describes allowing a user to select content packages and update personal information and preferences. The Applicants do not agree that Dobbins description of allowing a user to select content packages in any way teaches or suggests policies for self-subscribing to and self-unsubscribing from a group as recited in the pending claims. However, assuming for the sake of argument such a reading of Dobbins, neither Schneider nor Dobbins, alone or in combination, teach or suggest updating an attribute of an identity profile for the group based on such a policy.

In an attempt to demonstrate a teaching of updating an attribute of an identity profile for the group, i.e., based on application of the policy for self-subscription and/or self-unsubscription, the final Office Action introduces Liu. Liu is directed to "the analysis of the behavior and interests of users of online networks, and more particularly to the analysis and modeling of user's interests for users of the Internet and World Wide Web." (Col. 1, lines 7-10) More specifically, Liu describes "a system and methodology, and various software products that tracks user activity across multiple domains, and from such activity develops a time based model that describes the user's interests over time." (Col. 2, lines 15-18) "The changing user interests are also used to determine each user's membership in any number of defined user groups." (Col. 2, lines 19-20) "Each user's time based model of interests and group memberships forms a detailed profile of the Internet activity that can be used to market information and products to the user, to customize web content dynamically, or for other marketing purposes." (Col. 2, lines 21-

25) However, Liu also does not teach or suggest, alone or in combination with the other references, updating an attribute of an identity profile for the group, i.e., based on application of the policy for self-subscription and/or self-un-subscription. Rather, Liu describes updating a profile for a user to indicate the group memberships of a user for tracking purposes, not updating an attribute of an identity profile of the actual group based on application of the policy for self-subscription and/or self-un-subscription.

Claim 1, upon which claims 3-5 and 7-17 depend, and claim 24, upon which claims 26-30 depend, each recite in part "receiving from a first entity a request to add the first entity to a first group; accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group; and adding said first entity to said first group as a static member based on said first policy, wherein adding said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to include the first entity." None of the references teach or suggest, alone or in combination, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group and adding the entity as a static member of the group based on such a policy. For at least these reasons, claims 1, 3-5, 7-17, 24, and 26-30 should be allowed.

Claim 18, upon which claims 20-23 depend, and claim 31, upon which claims 33-36 depend, each recite in part "receiving from a first static member a request to remove the first static member from a first group; accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group; and removing said first static member from said first group based on said first policy, wherein removing said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to remove the first entity. None of the references teach or suggest, alone or in combination, accessing an indication of a first policy

from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group and removing the entity as a static member of the group based on such a policy. For at least these reasons, claims 18, 20-23, 31, and 33-36 should be allowed.

Claim 37, upon which claims 38-39 depend, recites in part "receiving from a first entity a request to add the first entity to a first group, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group, adding said first entity to said first group as a static member based on said first policy, wherein adding said first entity to said first group as a static member comprises updating an attribute of an identity profile for the first group to include the first entity, receiving from the first static member a request to remove the first static member from the first group, and removing said first static member from said first group based on said first policy, wherein removing said first entity to said first group as a static member comprises updating the attribute of the identity profile for the first group to remove the first entity." None of the references teach or suggest, alone or in combination, accessing an indication of a first policy from a plurality of policies, the plurality of policies defining policies for self-subscribing to and self-unsubscribing from said first group adding the entity as a static member of the group based on such a policy and removing the entity as a static member of the group based on such a policy. For at least these reasons, claims 37-39 should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

Appl. No. 09/998,898
Amdt. dated July 10, 2008
Amendment under 37 CFR 1.116 Expedited Procedure
Examining Group 2157

PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Dated: July 10, 2008

Respectfully submitted,

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